

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America )

v. )

NASER ALMADAOJI )

Case No. 3:18mj706

MICHAEL J. NEWMAN

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of beginning on an unknown date, but at least by on or about October 24, 2018 in the county of Greene in the Southern District of Ohio and elsewhere, the defendant(s) violated:

Code Section

18 U.S.C. 2339B

Offense Description

Attempt to Provide Material Support and Resources to a Foreign Terrorist Organization

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 10/24/18

City and state: Dayton, Ohio

Michael Herwig

Complainant's signature

Michael Herwig, Special Agent, FBI

Printed name and title

Michael J. Newman

Judge's signature

Hon. Michael J. Newman, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Michael Herwig, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a Complaint charging **Naser Almadaoji** (“**Almadaoji**”) with, beginning on an unknown date, but at least by on or about October 24, 2018, in the Southern District of Ohio and elsewhere, attempting to provide material support and resources to a foreign terrorist organization—that is, ISIS Wilayat Khorasan and ISIS—in violation of 18 U.S.C. § 2339B.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and I have been an agent since March 16, 2008. I have been assigned to the Joint Terrorism Task Force since 2008 and have worked cases involving international and domestic terrorism. As part of these investigations, I have participated in physical surveillance and records analysis, worked with informants, conducted interviews, served court orders and subpoenas, and executed search warrants.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

4. Title 18, United States Code, Section 2339B prohibits, in pertinent part, a person from knowingly providing material support or resources to a foreign terrorist organization, or attempting or conspiring to do the same.

5. The term “material support or resources” means any “property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel . . . , and transportation, except medicine or religious materials.” 18 U.S.C. Section 2339A(b)(1) and Section 2339B(g)(4).

6. On or about October 15, 2004, the United States Secretary of State designated al-Qa’ida in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

7. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (“ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

8. On December 31, 2015, the United States Secretary of State designated ISIL Khorasan as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. The Secretary of State also listed the following aliases for ISIL Khorasan: Islamic State’s Khorasan



Province, ISIS Wilayat Khorasan, ISIL's South Asian Branch, and South Asian Chapter of ISIL (collectively "ISIS Wilayat Khorasan"). To date, ISIL Khorasan remains a designated FTO.<sup>1</sup>

9. On March 28, 2014, the United States Secretary of State designated Ansar Bayt al-Maqdis ("ABM") as an FTO. According to the Department of State, in November 2014, ABM officially declared allegiance to Abu Bakr al-Baghdadi, who is the self-proclaimed leader of ISIS. On September 22, 2015, the Department of State amended ABM's designation to add ISIL Sinai Province as the primary name of the Islamic State affiliate located in Egypt's Sinai Peninsula, and the designation includes "Wilayat Sinai" as a known alias for ABM (collectively "Wilayat Sinai").<sup>2</sup>

10. **Almadaoji** is a 19-year-old individual who was born in Iraq and is a naturalized U.S. citizen. **Almadaoji** resides in Beavercreek, Ohio, within the Southern District of Ohio.

**I. Almadaoji travelled to Egypt and Jordan in February 2018.**

11. Between approximately February 16, 2018, and February 24, 2018, **Almadaoji** traveled to Egypt and Jordan.

12. On or about February 24, 2018, United States Customs and Border Protection ("CBP") interviewed **Almadaoji** upon his re-entry into the United States. During the interview with CBP, **Almadaoji** claimed to have traveled by himself to Jordan and Egypt and returned

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<sup>1</sup> According to the Department of State, ISIS Wilayat Khorasan announced its formation on January 10, 2015. The group is based in the Afghanistan/Pakistan region and is composed primarily of former members of Tehrik-e Taliban Pakistan and the Afghan Taliban. The senior leadership of ISIS Wilayat Khorasan has pledged allegiance to Abu Bakr al-Baghdadi, the leader of ISIS. This pledge was accepted in late January 2015 and since then ISIS Wilayat Khorasan has carried out suicide bombings, small arms attacks and kidnappings in eastern Afghanistan against civilians and Afghan National Security and Defense Forces, and claimed responsibility for May 2015 attacks on civilians in Karachi, Pakistan.

<sup>2</sup> Wilayat Sinai rose to prominence in 2011 following the uprisings in Egypt. It is responsible for attacks against the Israeli and Egyptian governments and against tourists in Egypt. In November 2014, Wilayat Sinai officially declared allegiance to ISIS.

after a taxi driver stole his backpack and \$3000. **Almadaoji** claimed that he reported the incident to the U.S. Embassy located in Jordan.

13. When talking with CBP, **Almadaoji** referenced U.S. airstrikes that killed Muslims and stated the United States needed to leave the Middle East. **Almadaoji** further stated he thought about joining the Peshmergan military in northern Iraq because it was the “real force[ ] in Iraq to stop ISIS, not U.S.” **Almadaoji** stated ISIS was “bad for killing other Muslims,” but most Muslims killed by ISIS were “Shiites,” and “Shiites were their [Sunnis] natural adversaries.” **Almadaoji** explained Shiites “didn’t follow true Islam” and the people of Iraq were no freer now than before ISIS invaded Iraq.

14. During the interview, CBP observed four shemagh-style head wraps in **Almadaoji’s** bag. When CBP asked about the shemaghs, **Almadaoji** responded he liked the way they looked on “fighters.” **Almadaoji** was asked if he had seen any fighters while overseas, and **Almadaoji** answered, “no not really,” but stated he observed “fighters” wearing shemaghs online.<sup>3</sup>

## **II. Almadaoji communicated online with individuals he believed to be working for ISIS.<sup>4</sup>**

15. On or about August 15, 2018, **Almadaoji** used an online messaging application to communicate with an FBI Confidential Human Source who was posing as an ISIS supporter

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<sup>3</sup> While **Almadaoji** did not admit to CBP that he intended to join Wilayat Sinai, he later represented to an FBI confidential human source that he tried to join the terrorist organization during his travels to Egypt and Jordan. And **Almadaoji** offered to provide advice and guidance online about how to travel overseas and avoid detection and suspicion from law-enforcement officers. See below at paragraphs 29-30.

<sup>4</sup> During the course of the investigation, **Almadaoji** communicated with one online covert employee, one undercover employee, and multiple confidential human source personas. This affidavit does not address each of the employees/personas, nor does it reference each communication relating to **Almadaoji**.

(“CHS Persona #1”).<sup>5</sup> **Almadaoji** told CHS Persona #1 that he was fluent in Arabic and English, and **Almadaoji** offered to help CHS Persona #1, stating “I don’t have much computer skills but if you guys ever need something in English or Arabic, let me know. I speak both languages fluently.”

16. On August 16, 2018, **Almadaoji** told CHS Persona #1 that he was not interested in college because he was “not planning to stay in this land much longer.” CHS Persona #1 asked **Almadaoji** if he was intending hijra,<sup>6</sup> and **Almadaoji** responded, “Yes akhi but I make dua and take every heed there is and Allah Subhanahu wa Ta’ala will find a way for His sincere servants.”<sup>7</sup> CHS Persona #1 offered to put **Almadaoji** in contact with a British individual in Iraq who “has helped an old friend of me get to khurassan.”<sup>8</sup> In response, **Almadaoji** stated, “anything you have is great.”

17. On August 16, 2018, **Almadaoji** initiated conversation with the individual he understood to be the Iraq-based British contact referenced above (“CHS Persona #2”). During the conversation, **Almadaoji** told CHS Persona #2 that he recently met CHS Persona #1 on the messaging application and discussed hijra with CHS Persona #1. **Almadaoji** told CHS Persona #2 that he was not ready for hijra, but he was trying to assist a brother in Egypt. To that end,

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<sup>5</sup> CHS Persona #1 posted a video depicting ISIS combat operations in Syria, and **Almadaoji** stated “Alhamdulillah,” which I understand to mean “Praise be to the Lord.”

<sup>6</sup> Based on my training and experience, and information from other agents, I know that “Hijra” or “Hijrah” is a term used to refer to traveling to territory controlled by the Islamic State.

<sup>7</sup> Based on my training and experience, “akhi” in this context means “brother” and “Allah Subhanahu wa Ta’ala” means “the most glorified, the most high.”

<sup>8</sup> Based on my training and experience, and information from other agents, I know that “khurassan,” also spelled “Khorasan,” or “Khurasan,” refers to ISIS affiliates in Afghanistan.



**Almadaoji** stated, “I know wilayat Sinai is not possible at the moment” and inquired “is there a way to Libya or anywhere near egypt.”

18. When CHS Persona #2 inquired why **Almadaoji** was not ready for hijra, **Almadaoji** stated, “Right now my problem is money.” **Almadaoji** stated: “I want sham but that’s not possible currently but maybe a few months from now when I’m ready.”<sup>9</sup> When CHS Persona #2 asked **Almadaoji** who he supported, **Almadaoji** refused to identify the group by name, stating: “Lol who goes by wilayat” and “I just don’t like to formally say it just in case the authorities here get their hands on these conversations.” When CHS Persona #2 said he has “spoken to brothers who think I’m AQ” (referring to Al-Qaeda), **Almadaoji** responded, “Lol no not those guys.”

19. CHS Persona #2 asked **Almadaoji** why he wanted to make hijra and suggested that “[m]any brothers will say that you are in the best place for jihad.” **Almadaoji** responded by saying “I don’t like where this is going . . . we’ll stick to hijrah for now.” CHS Persona #2 stated, “I am not trying to push you towards anything I have no way of helping you with something in your own country.” **Almadaoji** stated: “I know this akhi but once there us hijra then there will jihad in the land of hijra. I don’t like to keep traces back to me that’s why I’m not saying somethings by name just incase I end up messaging the wrong person without knowing.”

20. Between approximately August 18, 2018, and August 20, 2018, **Almadaoji** continued communicating with CHS Persona #2. On August 19, 2018, CHS Persona #2 offered to connect **Almadaoji** with “American brothers who have gone back” and who “often help brothers out.” **Almadaoji** responded, “That’ll be great akhi ask around and let me know” and

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<sup>9</sup> Based on my training and experience, and information from other agents, I know that “Sham” refers to the Levant, a geographic area including portions of Syria, Lebanon, Palestine, and Jordan. I also know that “Sham” commonly is used when referring to the portions of Syria where ISIS operates.

“Tell them north east us.” When **Almadaoji** inquired “why did they go back exactly,” CHS Persona #2 stated “Can’t say . . . your only allowed to leave if the emir has something for you to do. Let’s say that they have projects wherever they are.” **Almadaoji** responded, “Oh I see. I didn’t mean to ask it that way.”

21. On or about August 20, 2018, **Almadaoji** told CHS Persona #2 that he had “been to egypt once and met” an Egyptian associate there. **Almadaoji** stated: “I don’t wanna say here why I was in egypt but him and I planned something and it didn’t work at well.” CHS Persona #2 inquired, “Ahh how you know wilaya Sinai is hard to reach?” **Almadaoji** replied “Yea unfortunately I had to learn the hard way despite the fact I was talking to a brother and he told me that himself.” When asked by CHS Persona #2 if the brother had tricked him, **Almadaoji** stated, “No akhi the brother warned me it was difficult to reach Sinai, I don’t know if he was in the lands of Dawlah or just a munasir but no I didn’t end up in prison either.”<sup>10</sup>

22. CHS Persona #2 asked for **Almadaoji’s** thoughts on “assisting with some projects in your own country.” After CHS Persona #2 clarified that he was talking about the United States, **Almadaoji** stated it was a “big ask” and asked CHS Persona #2 to “shed a little light on the type of projects.” CHS Persona #2 replied: “I ask only if you would be willing or interested to contribute if hijra is not possible.” **Almadaoji** replied: “Of course I’m always willing.”

**III. Almadaoji pledged allegiance to ISIS and Abu Bakr Al-Baghdadi, and he discussed his desire to cause a conflict in the United States.**

23. On or about August 22, 2018, **Almadaoji** continued communicating with CHS Persona #2, who said to **Almadaoji**, “I told some of the brothers here about you, they were very impressed and want you to send a bayyah, two of our local leaders agreed to send you a video

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<sup>10</sup> Dawla and Dawlah are terms associated with, and commonly used to refer to, ISIS.



to.”<sup>11</sup> **Almadaoji** stated: “In shaa Allah we will then proceed forward with it” and “But since our talk about projects in the west I did a lot of thinking and I imagined a scenario of the collapse of the US as a nation. . . . They have alot of weak spots 2 really weak spots that would ignite the deadliest civil war on earth if the right spots are poked.” **Almadaoji** explained a proposal to start a conflict between the United States Government and anti-government militias.

24. When describing his proposed plot to start a conflict, **Almadaoji** explained how “federal buildings” were “more sensitive for the militias to hit than police stations and military bases.” **Almadaoji** stated, “With a coordinated attack such as car bombings parked next to fed buildings with all the previous build we talked about. . . . And there you have the US on its knees.” **Almadaoji** continued, “It may take the person a long time to pull something off but it’s long term . . . . This will divide the nation as a whole, including government, military and law enforcement.”

25. On or about August 24, 2018, **Almadaoji** told CHS Persona #2: “After thinking about it for sometime, these projects need secrecy, and lots of it. So there can’t be any physical evidence that leads it back to the I.S. [the Islamic State; ISIS].”

26. On August 25, 2018, **Almadaoji** told CHS Persona #2: “Although I did not get the project done. In shaa Allah expect a video coming soon today.” **Almadaoji** asked CHS Persona #2 whether he should send the video via messaging application, stating “Let me know as soon as possible akhi, I’m about to go shoot the video soon.” **Almadaoji** explained he would send the video on the following day.

27. On or about August 26, 2018, **Almadaoji** told CHS Persona #2: “Earlier when I tried to go do the video, I felt a sudden need for sleep, I had to force myself up to pray dhur and then

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<sup>11</sup> Based on my training and experience, and information from other agents, I know that bayyah, bayyat, and bayat, are Arabic terms that mean pledge, or oath, of allegiance to a leader.

went to sleep immediately after. There will be a spiritual struggle to get through with this akhi, I hope you understand if I take a little bit too long to get the video.” CHS Persona #2 replied: “Ok brother send when you can, today or tomorrow will be fine. Fighting here is starting to pick up so I want to make sure we get you in contact with the brothers soon that is my only concern. May Allah guide and facilitate you akhy.” Later that day, **Almadaoji** forwarded the bayyah video referenced on August 22, 2018, to CHS Persona #2. In the video, **Almadaoji** is wearing a head scarf and states:

Praise be to God and peace and prayers be upon His messenger. I pledge allegiance to Sheikh Abu Bakr al-Baghdadi, the Caliph of the faithful, to obey his command in all situations, in difficulty and in prosperity, and not to dispute orders until I see a common disbelief of which I have a proof from God. God is the witness to what I am saying.

28. On or about August 27, 2018, CHS Persona #2 provided **Almadaoji** with a list of questions purportedly from a hijrah application. One of the questions asked: “what is your skillset that could contribute to our cause/operations (training, experience, expertise, etc)?” **Almadaoji** responded, “Not alot if skills besides translating from arabic to English and vice versa. As well as intelligence.” Another question asked: “What role are you willing to play in the USA?” **Almadaoji** responded, “I believe that’s a role that’s already discussed in the plan as well as my time talking to you. In shaa Allah you can explain that to them.”

**IV. Almadaoji provided guidance and advice on how other individuals could avoid detection by, and suspicion from, law-enforcement officers when traveling for the purpose of joining ISIS.**

29. On or about August 31, 2018, CHS Persona #2 informed **Almadaoji** that it would be helpful if he could provide advice based on **Almadaoji’s** previous hijrah to Egypt and Jordan. **Almadaoji** offered to provide guidance so that other people could avoid his mistakes—“as well as to avoid them in shaa Allah”—and stated “In shaa Allah I’ll make a list of do’s and don’ts.” Among other advice, **Almadaoji’s** list included the following guidance:

- Ok first thing is you need to dress like a western guy who's about to enter a bar to pick up a few ladies. Something like jogging pants and van shoes as well as a long sleeve sweatshirt is great
- Unless you have a valid citizenship for the country you're about to travel to, then buy a 2 way ticket and make sure you print your return ticket as well incase they ask for it in the airport
- Of course delete anything suspicious in your phone but don't restart it as not to cause a suspicious alarm incase they ask to search your devices
- Don't bring anything suspicious either, such as a military bag, jacket, t-shirts, pants, etc
- And show them the case but I don't think that's something to worry about, if they ask who financed the trip, tell them you did
- When I was heading to al arish in northern sinai and our taxi was stopped by the military who blocked off the bridge cause it was close, no one in or out. There is a nice resort in al erish called swiss en al arish. That was my cover story. I told them it was next to the ocean and I'm here for vacation
- When going back, you may get a small paper to fill out about why your visiting the country, your name, the place your staying out, vice versa for citizens returning. Don't freak out. Remember Allah, put your trust in Him Subhanahu wa Ta'ala stick to your cover. Be nice to the officer questioning you, have a smile, keep a direct eye contact, and of course be cooperative

30. CHS Persona #2 asked how **Almadaoji** determined if the border was good to cross and whether there were differences in Egypt and Jordan. **Almadaoji** responded:

- I didn't determine that, I put my trust in Allah SWT and headed there. In regards to differences. Egypt was tightly controlled. When I was in jordan, I couldn't find a way in, so I started a small conversation with a taxi driver after we drove around for a bit and i bought him a nice sandwich to build up trust. I told him i had family in dar'a<sup>12</sup> and there was a way in. Subhan Allah he put me in touch with a guy who smuggles people into Europe

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<sup>12</sup> Based on my training and experience, and the nature, context, and timing of the communication, when **Almadaoji** refers to "dar'a," I believe he is referring to a city in Syria close to the border with Jordan.



I spoke to him and we met, he said there wasn't a way into syria from jordan but he could fly me out to turkey and from there meet the turkish mafia and that they would smuggle me anywhere in syria that I want

**V. Almadaoji translated ISIS propaganda.**

31. On or about September 14, 2018, CHS Persona #2 asked **Almadaoji** if he previously offered to translate information from Arabic to English and, if so, whether **Almadaoji** still was willing to do so. **Almadaoji** responded, "Yea, but I can't do hard Arabic vocabulary." **Almadaoji** then asked, "They want it for small books, or magazines and amaq<sup>13</sup> related?" CHS Persona #2 replied that he was unsure, but he was talking to a brother in France who needed things translated to English.

32. On or about September 14, 2018, the CHS used another French-based persona ("CHS Persona #3") and contacted **Almadaoji**. CHS Persona #3 informed **Almadaoji** that he was given **Almadaoji's** contact information because **Almadaoji** offered to translate materials. **Almadaoji** replied, "Yes akhi" and "How an I help." CHS Persona #3 informed **Almadaoji** that his/her Arabic was not very good and asked, "These are important dawla document you are ok to translate them?" **Almadaoji** replied, "In shaa Allah it shouldn't be a problem." CHS Persona #3 provided a document written in Arabic and said, "Try this one first it is important for our brothers in cyber caliphate."<sup>14</sup> **Almadaoji** responded, "In shaa Allah I'll get on later tonight." CHS Persona #3 thanked **Almadaoji**, who replied, "Don't thank me akhi, it's my duty."

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<sup>13</sup> Based on my training and experience, and information from other agents, I know that Amaq is the official propaganda-based news agency controlled by ISIS.

<sup>14</sup> This is a document that ISIS previously disseminated online.

33. On or about September 16, 2018, **Almadaoji** provided CHS Persona #3 with a digital file entitled “In The Name of Allah.docx.” The file contained a document that accurately translated the ISIS propaganda.<sup>15</sup>

**VI. Almadaoji decided to travel overseas and join ISIS Wilayat Khorasan, where he would receive military training.**

**A. Before traveling overseas to join ISIS Wilayat Khorasan, Almadaoji discussed his plan to start a conflict in the United States.**

34. On or about September 6, 2018, CHS Persona #2 informed **Almadaoji** that a U.S.-based individual would be contacting **Almadaoji**. Then, an FBI Undercover Employee (“UCE”) contacted **Almadaoji**. **Almadaoji** told the UCE about his plan to cause a conflict in the United States:

**Almadaoji:** *Let’s start of a plan with the 2 of us*

**UCE:** *K*

**Almadaoji:** *Number of assassination. Snipers, sticky ied’s, suicide look a like*

**Almadaoji:** *Before we do that. We pull something off like filling militia leaders computers and phones with child sexual abuse then tip the fbi. When the militias see their leaders are being arrested left and right, they’ll panic.*

**UCE:** *No doubt [text in Arabic]*

**Almadaoji:** *Then we start off assassinations.*

**Almadaoji:** *Soon militias will have standoffs with the feds which will turn bloody*

**UCE:** *Assassinate who?*

**Almadaoji:** *Militia leaders*

**UCE:** *Gotcha*

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<sup>15</sup> CHS Persona #3 provided **Almadaoji** with another document for translation from Arabic to English. **Almadaoji** accepted the materials for translation, but he did not complete the translation before attempting to travel overseas for the purpose of joining ISIS Wilayat Khorasan.

**Almadaoji:** *We'll also fire at feds so it looks like a 2 way thing and the militias are taking revenge*

**UCE:** *Now I see how this is coming together*

**Almadaoji:** *After it turns bloody, imagine a car bomb going off at a federal building killing dozens of feds*

35. **Almadaoji** then proposed robbing the “box of money” from the “large shia temple in Dearborn,” or “wait for the truck drive to come to an atm with a bag of cash, ambush him and take it,” as potential ways they could fund the operation.

36. On or about September 8, 2018, the UCE asked **Almadaoji**, “Is Dawla gonna take credit for this? Like on Amaq?” **Almadaoji** responded, “No we agreed to credit whatsoever. Even after things hit the fan and all out war breaks here in shaa Allah, we won’t risk taking credits to starting the war as not to ally them against us once again . . . No credit whatsoever\*.”

37. On or about September 8, 2018, **Almadaoji** told CHS Persona #2 that he talked to the “brother” in the United States. **Almadaoji** informed CHS Persona #2 that they needed money to carry out the plan. **Almadaoji** stated, “we need a guide on how to make a vbied. If you brothers could make it, send it to us through email. I’m gonna need to download it.”<sup>16</sup> **Almadaoji** also requested “a computer expert who’s an expert in hacking. That’s also vital.” **Almadaoji** said, “Tell the brothers to rest assure it’s all coming together bi’ithn Allah.”

38. On or about September 11, 2018, the UCE asked **Almadaoji** what sheiks he followed; **Almadaoji** replied, “Imam anwar al awlaki.”<sup>17</sup> On or about September 12, 2018,

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<sup>16</sup> Based on my training and experience, and information from other agents, I know that “vbied” refers to “vehicle-borne improvised-explosive devices.”

<sup>17</sup> Anwar al-Awlaki was an Islamic lecturer and a leader of Al-Qaeda in the Arabian Peninsula (“AQAP”), a Yemen-based designated foreign terrorist organization that claimed responsibility for terrorist acts against targets in the United States, Saudi Arabia, Korea, and Yemen since its inception in January 2009. Pursuant to a Presidential Executive Order, Al-Awlaki was designated by the United States as a “Specially Designated Global Terrorist” on July 12, 2010. Al-Awlaki was killed in Yemen in



**Almadaoji** talked with the UCE about robbing an ATM, or ambushing an armored truck: “That truck guy must have multiple bags of cash to fill multiple atms. We’ll ambush him, make open the back door get in the atm back room. Grab all the cash in there and all the bags in the truck.”

**B. Almadaoji decided to travel to Kazakhstan, where he could be smuggled to ISIS Wilayat Khorasan—one of the terrorist organizations he sought to join.**

39. On or about September 13, 2018, **Almadaoji** told the UCE that the UCE could make hijrah because “the brothers can put you in contact with smugglers.” **Almadaoji** clarified, “I’m talking about the ones in Iraq, they can get you in contact, the brothers from Khurasan keep insisting on making hijra there in the last few videos they released.”

40. **Almadaoji** and the UCE then talked about training with ISIS:

**UCE:** *Do u think we can flee n make hijra after we do our work here?*

**UCE:** *We’ll have \$\$\$ for plane tickets right?*

**Almadaoji:** *I’m not sure how it’s gonna play out, but we need training on weapons and on how to handle ourselves in different types of situations*

**Almadaoji:** *I’m think we get the proper training first than come back*

\* \* \*

**Almadaoji:** *We get smuggled in and then smuggled out of Khurasan no problem*

**UCE:** *Really? No Problem?*

**Almadaoji:** *No one will suspect a thing unless we leave a trace*

**Almadaoji:** *It’s same as working here, we will have a problem if we leave a trace so we don’t plan to. We shouldn’t plan to leave a trace in Khurasan either*

**Almadaoji:** *Come on akhi it’s not rocket science*

**UCE:** *Do u have any idea of what it’s like in Khurasan?*

**Almadaoji:** *No but why does that matter*

**UCE:** *Just trying to think it thru*

**UCE:** *Like r there even buses and trains to get around*

**UCE:** *Or what's the closet airport*

**Almadaoji:** *We pay smugglers. We can go through Kazakhstan*

**UCE:** *How do we find a trustworthy smuggler*

**Almadaoji:** *The brothers have that covered*

**UCE:** *What brothers? We're not talking to the same brothers*

**Almadaoji:** *No but the one I'm talking to has contacts with smugglers in Kazakhstan*

**UCE:** *Ok*

**Almadaoji:** *I'll propose the idea*

41. On or about September 14, 2018, **Almadaoji** confirmed his plan with CHS Persona #2: "Forgive me for asking you too much, but as you know we lack training so we're thinking of heading to Khurasan for that once we have enough funds. Once that's taken care of, we'll return to the US."

42. On or about September 17, 2018, **Almadaoji** suggested robbing a jewelry store to obtain the necessary funding for overseas travel and asked the UCE to find buyers. On or about September 18, 2018, the UCE and **Almadaoji** met at a local parking lot, and the UCE drove **Almadaoji** to a park in Beavercreek, Ohio. At that meeting, **Almadaoji** and the UCE discussed funding. **Almadaoji** stated, "You know, we gotta find a way to do it ourselves. And I think that the option I presented to you yesterday [the jewelry heist], I think that's the best option we have" and "[t]hen we go, we go to Kazakhstan."<sup>18</sup>

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<sup>18</sup> Many of the summaries of, and quotes from, the conversations between **Almadaoji** and the UCE/CHSs refer to preliminary transcriptions provided by the FBI.

43. **Almadaoji** explained that Astana was the capital of Kazakhstan, and it has a tourism-based economy. The UCE asked **Almadaoji** if he researched it; **Almadaoji** replied, “Oh yeah, I research it. The only problems we are going to face. The visa only lasts for a month. We’re going to be out of the country for more than that. So, unless, you know, we find a way around it or say.” The UCE then summarized the plan set by **Almadaoji**:

**UCE:** *Alright we fly from the US to Kazakhstan.*

**Almadaoji:** *Right.*

**UCE:** *Get the one month visa. And then from there.*

**Almadaoji:** *To Khorasan.*

**UCE:** *Khorasan. Wilayat al-Khorasan.*

**Almadaoji:** *Right.*

44. **Almadaoji** and the UCE discussed being smuggled into Afghanistan. **Almadaoji** explained they would have to cross two countries, move through mountainous terrain, and travel on foot, stating, “Inshallah we have to go through the hardship, you know what I’m saying” and “Keep your eyes on the horizon, Khorasan.”

45. While **Almadaoji** planned with the UCE, **Almadaoji** separately continued communicating with CHS Persona #2. On or about September 26, 2018, **Almadaoji** told CHS Persona #2: “By the way I’m the one leading everything here between me and the brother. I once again remind you, I know more about what’s going with this whole thing than he does.” **Almadaoji** further stated, “Too many things and plans are being thrown around right now, I need to manage this and figure out what best works out for us.”

46. On or about September 26, 2018, **Almadaoji** again discussed starting a conflict in the United States. To that end, **Almadaoji** asked CHS Persona #2 for support: “I would also like



to have 2 more guys to run point on executing these operations, and give us the ability to operate on more than one front. Now I know you don't know any, but if you could speak to the ameers on your end and see if they could talk to other ameers and pull a few strings, that would be great. 5 operators all together. 1 computer expert providing information for the operation and communication during the operation, and 4 of us running point in carrying out the special operations. I will personally deal with the funds myself and come up with plans to fund us, so you don't have to worry about that."

47. CHS Persona #2 explained to **Almadaoji** that ISIS could not provide additional resources. **Almadaoji** then decided to focus his efforts on traveling overseas and training with ISIS Wilayat Khorasan.

48. On or about September 27, 2018, **Almadaoji** told CHS Persona #2, "Seems like khurasan is easiest way if you have contacts in kazakhstan as we spoke about before . . . . If the plan doesn't interest them, we can look at different ones that I already have in place and with enough resources, we can launch multiple ones with different teams that won't know each other or know the other plans are in place." **Almadaoji** outlined two plans that could contribute to the "economic collapse" of the United States, which included the kidnapping of wealthy individuals and the targeting of the power grid in the United States. CHS Persona #2 suggested those plans would require tremendous resources and instead offered to help **Almadaoji** if he wished to travel to Sham or Khorasan. **Almadaoji** responded, "I still think khurasan is the place for a temporarily stay but sham for a permanent stay. This all depends if resources can be provided or not. My ideas are to boost things up but eventually the US will collapse no matter what."

49. On or about September 28, 2018, CHS Persona #2 asked what kind of training **Almadaoji** would like to receive when in Khorasan. **Almadaoji** responded, "All type of training

from weapons experts training, planning, executing, hit and run, capturing high value targets, ways to break into homes and avoid security guards. That type of training. Shouldn't take more than 3 months." **Almadaoji** and CHS Persona #2 then discussed travel options, including Iraq and Sham, but **Almadaoji** stated, "In shaa Allah. We'll stick to khurasan for now." **Almadaoji** advised, "Once the money is in our hands, we should be there within a week in shaa Allah."

50. On or about September 28, 2018, when communicating with CHS Persona #2, **Almadaoji** also communicated with the UCE, who asked **Almadaoji** if he was telling his family about their trip. **Almadaoji** responded, "No never." The UCE then said, "We just leave and nobody knows." **Almadaoji** replied "In shaa Allah" and said "Just a vacation to kazakhstan."

51. On or about September 29, 2018, the UCE told **Almadaoji** they could obtain funds through a credit-card scheme. **Almadaoji** told the UCE they would need \$1700 each for flights, plus \$800 for smuggling, and \$200 for food, taxis, and lodging. The UCE asked **Almadaoji** about the smugglers. **Almadaoji** replied, "The brother will put me in contact with them and I assume that's once we get there," and he confirmed, "So yea I'll be the one dealing with the issue of smugglers in shaa Allah."

52. On or about September 30, 2018, the UCE asked **Almadaoji** if he thought they could request training to make IEDs when in Khorasan. **Almadaoji** replied, "As I said akhi we're going to kazakhstan as tourists."

53. On or about October 1, 2018, the UCE told **Almadaoji** that he received the first two credit cards in the mail and would try to withdraw cash. **Almadaoji** advised the UCE to "park your car far and walk the rest" and "Gloves too no need for a hoodie as long as you have the hat. Don't wanna look too suspicious" and "Keep your head down and put the glasses on

when you get close to the atm.” Later that evening, the UCE told **Almadaoji** that he obtained \$500 for each of them, to which **Almadaoji** replied, “Alhamdulillah.”

54. On or about October 1, 2018, **Almadaoji** asked CHS Persona #2, “Where do we land exactly in kazakhstan? I’m thinking Astana but it’s far from the southern part of the country and I don’t want to take trains. Also what about the other country/ies, do we need visa or are getting smuggled through them too?”

55. On or about October 2, 2018, the UCE told **Almadaoji** that he had withdrawn another \$500 per credit card. **Almadaoji** also told the UCE, “Just finish the 1,000 for each card tonight in shaa Allah and bring me the whole 2,000 on Thursday if you can in shaa Allah.” **Almadaoji** mentioned that they may go to a city other than Astana, possibly Almaty.<sup>19</sup> When the UCE asked if there were smugglers in Almaty, **Almadaoji** admonished the UCE by saying, “What smugglers? We’re there for vacation.”

56. On or about October 3, 2018, **Almadaoji** inquired whether the UCE had obtained more cash. The UCE confirmed that he obtained an additional \$500 per card. **Almadaoji** instructed the UCE to rent a car and “tell them your dropping it off at the Columbus airport.” The UCE said there may be security cameras and they should not be seen together on the day of the departure. **Almadaoji** responded, “It won’t matter in shaa Allah we’ll be leaving and not coming back.” The UCE advised that there would be enough cash for **Almadaoji** to use a bus, or taxi, to travel to the airport in Columbus. **Almadaoji** responded, “Look akhi, I need to buy a few things before going to the airport. This what we’ll do. You rent a car pretty early. Pick me up. We’ll go buy my things. Then once we’re near the airport. You call me a [ride-share car] and we’ll meet on the plane in shaa Allah.”

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<sup>19</sup> Almaty is Kazakhstan’s most populated city.



57. On or about October 4, 2018, the UCE told **Almadaoji** that he had \$2000 and did not know when he would be able to meet **Almadaoji** in person other than that day, or the day of travel. **Almadaoji** said it was better to wait until they each had \$4000 before booking the tickets. The UCE asked if they were still leaving on October 16, 2018, and **Almadaoji** responded, “Around that date yea.” **Almadaoji** later told the UCE not to worry about driving together to the airport: “Plus bro your thinking too much about it. It doesn’t matter if you drop me off at the airport . . . If anybody has anything about us we’ll be stopped or in the airport so we put our trust in Allah Subhanahu wa Ta’ala.”

58. Later that day, the UCE picked up **Almadaoji** and drove to a nearby park. During the meeting, the UCE provided **Almadaoji** with a cup containing \$2000 cash. The UCE and **Almadaoji** discussed what airports they might depart, the price of plane tickets, and purchasing plane tickets with cash versus a debit card. **Almadaoji** talked about Astana, Kazakhstan, and the cost for a train to southern Kazakhstan. The UCE asked if the smugglers were with ISIS Wilayat Khorasan because he did not want to get ripped off by criminals and wanted to ensure they were trusted by ISIS Wilayat Khorasan. **Almadaoji** replied he was asking a brother for details relating to the smugglers.

59. Later, the UCE asked about the arrival in Khorasan and whether they would go straight to training. **Almadaoji** stated he understood when they arrived, they would be asked about the kind of special skills each of them possessed. **Almadaoji** mentioned having the skill to translate Arabic to English and English to Arabic.

60. **Almadaoji** told the UCE that they would travel looking “like straight up Americans.” Once on the flight from Germany to Kazakhstan, they would be “buddies” traveling

together. **Almadaoji** confirmed that the al-mahajiroun<sup>20</sup> would be happy when **Almadaoji** and the UCE arrived and advised it would be fine to pack a shemagh. When leaving the park, **Almadaoji** confirmed he had the cup containing the cash. **Almadaoji** indicated he was going to take \$300 with him, deposit the remaining cash, and use a debit card to purchase his plane ticket.

61. On or about October 4, 2018, **Almadaoji** informed CHS Persona #2 that they had \$4000 and were waiting for an additional \$4000. **Almadaoji** stated, "I need to know what city to land in." CHS Persona #2 provided Peshawar and Astana as options, and CHS Persona #2 requested that **Almadaoji** choose the destination city, send the travel itinerary, and once **Almadaoji** landed, provide a photo so that CHS Persona #2 could arrange for the driver to pick up **Almadaoji** at the airport. **Almadaoji** responded, "Astana" and "I'm not gonna send you anything besides that for security purposes. I already have my tazkiya."<sup>21</sup> If anyone has a problem with that, they can deal with it. Gave bay'a and got tazkiya for that, if they are afraid of me being a spy, I'm afraid your fbi and need my itinerary for prison purpose. I'm not gonna argue about that so deal with from your side. If you disagree, I'll let the brother know and he'll make his own choice." CHS Persona #2 explained the request was for **Almadaoji's** safety and that he needed to know when **Almadaoji** arrived in Astana to arrange for the smuggler. **Almadaoji** replied he would take a picture when in Astana, stating "I can take care of myself so you don't need to worry." **Almadaoji** then advised that he met the UCE and got \$2000. **Almadaoji** later sent a picture of what appeared to be a US passport and a large amount of cash.

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<sup>20</sup> Based on my training and experience, and information from other agents, I understand the term "al-mahajiroun" translates to "emigrant(s)," and it is used when referencing individuals who make hijrah. I further understand the term is used synonymously for foreign fighters who completed hijrah to join the Islamic State.

<sup>21</sup> Based on my training and experience, and the nature, context, and timing of the communication, when **Almadaoji** refers to "Tazkiah," I believe he means the Islamic term alluding to "tazkiyah al-nafs" meaning "purification of the self."

62. On or about October 5, 2018, **Almadaoji** informed the UCE that he was asked if they wanted to arrive in Peshawar, or Astana. **Almadaoji** stated, "Peshawar is in Pakistan so we need a visa from the embassy here. So I told him Astana." **Almadaoji** further explained to the UCE that the smuggler would pick them up at the airport, and **Almadaoji** would have the code word to ensure they were traveling with the right smuggler.

63. On or about October 6, 2018, the UCE told **Almadaoji** that he had an additional \$1000 and asked if \$8000 would be enough for their travel. **Almadaoji** replied, "Yea bro 8k will do it." **Almadaoji** told the UCE, "If all goes well, we'll departure 10 days from now in shaa Allah." **Almadaoji** stated if anything got in the way they could push the date back because October 16 was not "forced upon us."

64. On or about October 8, 2018, **Almadaoji** told the UCE that "the brother is getting things ready" and "the tour guide is gonna take us straight to the brothers and the brothers will know we're coming." The UCE confirmed he obtained the rest of the money. **Almadaoji** replied, "Alhamdulillah I'll try to go to the bank and reopen my account." He informed the UCE, "Alhamdulillah it's all going well. Once I put money in the bank, we're booking in shaa Allah." **Almadaoji** stated that he had concerns about depositing cash into his bank account because the serial numbers on the currency could be traced, and indicated he could convert the cash into money orders to be deposited. On October 9, 2018, **Almadaoji** confirmed that he was "sticking with money order[s]."

65. Earlier in October 2018, **Almadaoji** instructed the UCE to download a different messaging application for their travels; the UCE did so. **Almadaoji** instructed the UCE to "reply yes to my [messaging application] message and add a few things to make it look normal."



66. On or about October 10, 2018, **Almadaoji** informed the UCE that his “Bank account is good Alhamdulillah” and advised, “You gotta start looking for a car rental now bro.” The UCE replied he just needed to know the date. **Almadaoji** responded, “OK it depends on what day my credit card comes [in]” and, “If it does Saturday we’ll book for the 16<sup>th</sup>, if Monday we’ll book for the 17<sup>th</sup>.” **Almadaoji** further explained he would make more trips to the bank to deposit the money. The UCE advised that he was unable to obtain further funds from the credit-card scam. **Almadaoji** replied, “Alright bro they’re maxed out. Just forget about it. We have enough Alhamdulillah.”

67. Between October 10, 2018, and October 22, 2018, **Almadaoji** continued to wait for delivery of his credit card from the bank. On or about October 19, 2018, **Almadaoji** told the UCE that the credit card did not arrive and that he “Called and they [the bank] said it [the credit card] should be here Monday the latest.” During that time, **Almadaoji** continued to research airfare and flight schedules for travel from Columbus, Ohio, to Astana, Kazakhstan, and he shared the results of his research with the UCE.

68. On or about Monday, October 22, 2018, **Almadaoji** told the UCE that the credit card arrived in the mail.

## **VII. Almadaoji purchased tickets for travelling overseas**

69. On or about October 23, 2018, I obtained records showing that tickets have been issued in the name of “**Naser Almadaoji**” for travel as a passenger on flights from, and to, the following locations, and on the following dates: (1) from John Glenn Columbus International Airport to Washington Dulles International Airport on October 24, 2018; (2) from Washington Dulles International Airport to Frankfurt Airport on October 24, 2018; and (3) from Frankfurt

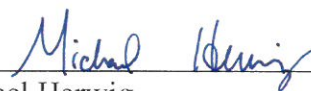
Airport to Astana International Airport on October 25, 2018. Records indicate that the tickets were purchased using a credit card for a total cost of \$1415.33.

70. On or about October 24, 2018, at approximately 10:00 a.m., **Almadaoji** met with the UCE at a local parking lot where the two had previously met. The UCE drove **Almadaoji** to a local store, where **Almadaoji** purchased a bag and other items for his travel overseas.

71. The UCE then drove **Almadaoji** to John Glenn Columbus International Airport in a rental car. The UCE dropped **Almadaoji** off at the curb located near the departure terminal and returned the rental car, leaving **Almadaoji** by himself. **Almadaoji** proceeded to the airline ticket counter, where he obtained his boarding pass. After **Almadaoji** obtained his boarding pass and walked towards TSA security, law-enforcement officers arrested him.

72. Based on the foregoing, there is probable cause to believe that on an exact date that is unknown, but at least by on or about October 24, 2018, in the Southern District of Ohio and elsewhere, **Almadaoji** attempted to provide material support or resources to a foreign terrorist organization—that is, ISIS Wilayat Khorasan and ISIS—in violation of Title 18, United States Code, Section 2339B.

Respectfully submitted,

  
\_\_\_\_\_  
Michael Herwig  
Special Agent, FBI

Subscribed and sworn to before me on October 24, 2018.

  
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Hon. Michael J. Newman  
United States Magistrate Judge

